

From: Jason D. Jones
To: Maurano, Stephen; Bolt, Matthew
Cc: Jason W. Sutter; Aiko Condon; Doug McCarty
Subject: FW: 2014 WQLS
Date: Tuesday, January 17, 2017 8:26:12 AM

Hi Stephen and Matt – I've included Doug's comments regarding the Gila River (Reach 15040002-001 and 002). Sutter already commented on the Queen Creek tribs and we agreed that the Colorado River was already addressed. This should address all the reaches you had questions on in your 1/11 email. Please let me know if you need any additional information to proceed with the approval.

Jason D. Jones

Supervisor, Monitoring & Assessment Unit
Arizona Department of Environmental Quality
Phoenix, AZ 85007
Ph: (602) 771-2235
Email: jdj@azdeq.gov

From: Doug McCarty
Sent: Thursday, January 12, 2017 5:05 PM
To: Jason D. Jones <Jones.Jason@azdeq.gov>; Aiko Condon <Condon.Aiko@azdeq.gov>
Cc: Jason W. Sutter <Sutter.Jason@azdeq.gov>
Subject: RE: 2014 WQLS

I think we all talked about this at some point (except JDJ), but I'm not sure the justification was ever put down in writing anywhere.

Essentially, the justification was that both reaches in question were bracketed by the Gila River E. coli TMDL started in 2007 and approved in 2012. Load allocations were set (mass-based, if memory serves) for both Reach 022 and 004 bookending the reaches in question. In fact, I think the listing for these segments on the 303d list probably came about because of the sampling done during the TMDL project in 2007. At the time of sampling, analysis, and write-up, I had no way of knowing what would be additionally listed as a consequence of this project. But it's academic in any event.

Check Tables 7, 9, 11, and 13 in the TMDL document:

http://azdeq.gov/sites/default/files/uppergila_ecoli_tmdl.pdf

Though the subwatersheds corresponding to the specific water body IDs were not explicitly called out in the document, the loads are implicit in the "Gila River – Yuma Wash to Bitter Creek" subwatershed, cumulatively with the watersheds defined above that point. The cumulative load allocations were fixed by Reach 022 downstream of the project area; LAs for reaches above that point had to be prorated (including the Bitter Creek Reach 004) based on what would still allow for standards to be met at the furthest downstream point. Since this assumption controlled, the reaches in between are forced to adhere to stricter mass-based LAs than the standard would otherwise permit in the reaches themselves. Consequently, If Reach 022 ever comes into attainment of WQ stds, the upstream reaches will by necessity, too. There are no point sources/WLAs to consider in this project area in eastern AZ.

From a purely pragmatic point of view, the reason this came up was that I questioned its inclusion in the impaired waters listing, for the reasons outlined above, and for the fact that it was highly unlikely that we would institute another TMDL(s) in an area bracketed already by TMDLs. TMDLs represent a sizable investment of time, effort, and resources, financial and otherwise, and it makes no sense to go back to an area we've already covered before to do further study, particularly when the load allocations would still be subject to control/proration from the downstream bracket reach. I think we would be well-served to consider expanding this principle, for there are several other impaired reaches that might also fit the same criteria (like the current SPR EC impairments in the upper watershed, along with one at the mouth). I know I'm preaching to the choir, but water quality degradation is a regional problem, and common sense says that if one reach is impaired, the others around it probably are too, whether formally listed or not. This happened to be a case where implicit load allocations were already provided that would solve the analytical problem. So, in effect, the TMDLs have already been done, and the status is therefore legitimately 4A.

Let me know if we need to write up some sort of formal justification.

DMc

From: Jason D. Jones
Sent: Thursday, January 12, 2017 3:55 PM
To: Aiko Condon <Condon.Aiko@azdeq.gov>; Doug McCarty <McCarty.Doug@azdeq.gov>
Cc: Jason W. Sutter <Sutter.Jason@azdeq.gov>
Subject: FW: 2014 WQLS

FYI.

Jason D. Jones

Supervisor, Monitoring & Assessment Unit
Arizona Department of Environmental Quality
Phoenix, AZ 85007
Ph: (602) 771-2235
Email: jdj@azdeq.gov

From: Maurano, Stephen [<mailto:Maurano.Stephen@epa.gov>]
Sent: Thursday, January 12, 2017 3:38 PM
To: Jason D. Jones <Jones.Jason@azdeq.gov>
Cc: Guiliano, Dave <Guiliano.Dave@epa.gov>; Aiko Condon <Condon.Aiko@azdeq.gov>; Jason W. Sutter <Sutter.Jason@azdeq.gov>; Hashimoto, Janet <Hashimoto.Janet@epa.gov>; Bolt, Matthew <Bolt.Matthew@epa.gov>
Subject: RE: 2014 WQLS

Thanks so much Jason for the info talking on the phone. We're clear on the Colorado River Imperial Dam to Gila River segment, and look forward to seeing the information on

the other segments you guys mentioned. For the sake of clarity, attached is a map of the Upper Gila segments relevant to the 303(d) list and the [2012 TMDL](#).

Thanks,

Stephen Maurano
U.S. Environmental Protection Agency, Region 9
Water Division, Ecosystems Branch, Assessment Section
75 Hawthorne Street (WTR-2-1), San Francisco, CA 94105-3901
(415) 972-3477 maurano.stephen@epa.gov

From: Jason D. Jones [<mailto:Jones.Jason@azdeq.gov>]
Sent: Thursday, January 12, 2017 1:39 PM
To: Bolt, Matthew <Bolt.Matthew@epa.gov>
Cc: Guiliano, Dave <GUILIANO.DAVE@epa.gov>; Maurano, Stephen <Maurano.Stephen@epa.gov>; Aiko Condon <Condon.Aiko@azdeq.gov>; Jason W. Sutter <Sutter.Jason@azdeq.gov>
Subject: RE: 2014 WQLS

Hi Matt – I'm available this afternoon or next week to discuss. I've copied Aiko Condon and Jason Sutter on this email as well to help with this.

Jason D. Jones

Supervisor, Monitoring & Assessment Unit
Arizona Department of Environmental Quality
Phoenix, AZ 85007
Ph: (602) 771-2235
Email: jdj@azdeq.gov

From: Bolt, Matthew [<mailto:Bolt.Matthew@epa.gov>]
Sent: Wednesday, January 11, 2017 5:20 PM
To: Jason D. Jones <Jones.Jason@azdeq.gov>
Cc: Guiliano, Dave <GUILIANO.DAVE@epa.gov>; Maurano, Stephen <Maurano.Stephen@epa.gov>
Subject: 2014 WQLS

Hi Jason,
Stephen and I have been reviewing the 2016-303(d) materials. We are having difficulty reconciling across appendices and lists on the below Water Quality Limited Segments. Are you available for a call to discuss these either Thursday (1/12) or next week?

Origin List	Watershed	WBID (Name)	WBID (#)	Size (mi or acres)	Cause of impairment	Year first listed
2014	Colorado-Lower Gila Watershed	Colorado River Imperial Dam to Gila River	15030107-003	15.3 mi	Selenium (total)	2010
2014	Middle Gila Watershed	Unnamed Tributary to Queen Creek Headwaters to Queen Creek	15050100-1000	0.5 mi	Copper (dissolved)	2010
2014	Middle Gila Watershed	Unnamed Tributary to Queen Creek Headwaters to Queen Creek	15050100-1843	1.7 mi	Copper (dissolved)	2010
2014	Middle Gila Watershed	Tributary to Queen Creek Headwaters to Queen Creek	15050100-991	2.0 mi	Copper (dissolved)	2010
2014	Upper Gila Watershed	Gila River Skully Creek to San Francisco River	15040002-001	15.2 mi	E. coli	2010
2014	Upper Gila Watershed	Gila River Apache Creek to Skully Creek	15040002-002	6.4 mi	E. coli	2010

Thank you,
Matt

Matthew Bolt
Life Scientist
Water Quality Assessment Section
US EPA Region 9
75 Hawthorne Street (WTR-2-1)
San Francisco, CA 94105-3901
(415) 972-3578

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